

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
See List of Cases Attached as Ex. 1

MDL 2804

Case No. 1:17-md-2804-DAP

Hon. Dan Aaron Polster

CERTIFICATION

Pursuant to the Court's Order entered on October 4, 2024 and the Court's instructions during the status conference on October 17, 2024, Counsel hereby certifies that the information contained in Dkt. 5589-1 for the attached list of Virginia cases remains true and accurate to the best of Counsel's knowledge and belief.¹

Counsel draws particular attention to the following cases with litigation holds implemented on the dates identified:

Case number	Case Title	State	Complaint Filed	Plaintiff Sent Litigation Hold?	Date Implemented
1:19-op-45766-DAP	Fairfax County Board of Supervisors	VA	4/30/2019	Y	7/11/2019
1:19-op-45236-DAP	Giles County	VA	8/27/2018	Y	6/6/2018
1:20-op-45172-DAP	Henrico County	VA	1/23/2020	Y	1/22/2020
1:21-op-45078-DAP	The County Board of Arlington County	VA	4/1/2019 ²	Y	6/9/2020

In the process of re-confirming the above details, Counsel was informed that, notwithstanding the implementation of a litigation hold in Henrico County, the Henrico County

¹ For Giles County, Case No. 1:19-op-45236-DAP, the implementation date should be June 6, 2018, rather than June 1, 2018.

² A prior submission listed Arlington County's filing as April 8, 2019. The correct date is April 1, 2019.

Department of Social Services (DSS) (a County-State partnership) no longer has access to certain hard copy records. These hard copy records consisted of family assessment and investigative files, family preservation files, and case records dated during the relevant time period. Counsel is prepared to supply further detail regarding these hard copy files upon request.

DATED: 10/23/24

Respectfully submitted,

/s/ Kevin Sharp

SANFORD HEISLER SHARP MCKNIGHT, LLP

Kevin Sharp

ksharp@sanfordheisler.com

Grant Morris

gmorris@sanfordheisler.com

Christine Dunn

cdunn@sanfordheisler.com

Jonathan Tepe

jtepe@sanfordheisler.com

611 Commerce Street, Suite 3100

Nashville, Tennessee 37203

Tel: (615) 434-7000

Fax: (615) 434-7020

/s/ Joanne Cicala

THE CICALA LAW FIRM PLLC

Joanne Cicala

joanne@cicalapllc.com

Josh Wackerly

josh@cicalapllc.com

Johan Conrod

johan@cicalapllc.com

101 College Street

Dripping Springs, Texas 78620

Tel: (512) 275-6550

Fax: (512) 858-1801

/s/ W. Edgar Spivey

KAUFMAN & CANOLES, P.C.

W. Edgar Spivey

wespivey@kaufcan.com

Patrick. H. O. Donnell
phodonnell@kaufcan.com
150 W. Main Street, Suite 2100
Norfolk, Virginia 23510-1665
Tel: (757) 624-3196
Fax: (888) 360-9092

Attorneys for Plaintiffs Listed in Ex. 1

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/ Kevin Sharp _____

Kevin Sharp
Sanford, Heisler, Sharp, McKnight, LLP

EXHIBIT 1

Case number	Case Title	State
1:19-op-45715-DAP	Accomack County	VA
1:19-op-45700-DAP	Alleghany County	VA
1:20-op-45046-DAP	Amherst County	VA
1:19-op-45687-DAP	Board of Supervisors, Prince William County	VA
1:20-op-45064-DAP	Botetourt County	VA
1:19-op-45851-DAP	Charlotte County	VA
1:20-op-45173-DAP	Chesterfield County	VA
1:19-op-45246-DAP	City of Alexandria	VA
1:19-op-45719-DAP	City of Bristol	VA
1:20-op-45159-DAP	City of Buena Vista	VA
1:19-op-45712-DAP	City of Chesapeake	VA
1:19-op-45799-DAP	City of Covington	VA
1:19-op-46850-DAP	City of Emporia	VA
1:20-op-45177-DAP	City of Fairfax	VA
1:19-op-45898-DAP	City of Fredericksburg	VA
1:19-op-45243-DAP	City of Galax	VA
1:19-op-45693-DAP	City of Lexington	VA
1:19-op-45249-DAP	City of Norton	VA
1:19-op-46154-DAP	City of Radford	VA
1:19-op-45696-DAP	City of Roanoke	VA
1:19-op-45697-DAP	City of Salem	VA
1:19-op-46152-DAP	City of Waynesboro	VA
1:20-op-45176-DAP	City of Winchester	VA
1:19-op-45849-DAP	Culpeper County	VA
1:19-op-46153-DAP	Cumberland County	VA
1:19-op-45252-DAP	Dickenson County	VA
1:20-op-45291-DAP	Dinwiddie County	VA
1:19-op-45766-DAP	Fairfax County Board Of Supervisors	VA
1:19-op-45686-DAP	Fauquier County	VA
1:19-op-45698-DAP	Floyd County	VA
1:19-op-45701-DAP	Franklin County	VA
1:20-op-45233-DAP	Frederick County	VA
1:19-op-45236-DAP	Giles County	VA
1:20-op-45175-DAP	Goochland County	VA
1:19-op-45848-DAP	Greenville County	VA

1:19-op-45692-DAP	Halifax County	VA
1:20-op-45172-DAP	Henrico County	VA
1:19-op-45245-DAP	Henry County	VA
1:20-op-45145-DAP	Isle Of Wight County	VA
1:20-op-45138-DAP	King and Queen County	VA
1:19-op-45251-DAP	Lee County	VA
1:19-op-45842-DAP	Loudoun County	VA
1:19-op-45720-DAP	Louisa County	VA
1:19-op-45702-DAP	Madison County	VA
1:20-op-45174-DAP	Mecklenburg County	VA
1:19-op-45234-DAP	Montgomery County	VA
1:20-op-45144-DAP	Northampton County	VA
1:19-op-45688-DAP	Northumberland County	VA
1:19-op-45275-DAP	Page County	VA
1:19-op-46149-DAP	Patrick County	VA
1:19-op-45247-DAP	Pittsylvania County	VA
1:19-op-45929-DAP	Prince George County	VA
1:19-op-45695-DAP	Roanoke County	VA
1:19-op-45694-DAP	Rockbridge County	VA
1:19-op-46150-DAP	Shenandoah County	VA
1:20-op-45178-DAP	Stafford County	VA
1:21-op-45078-DAP	The County Board of Arlington County	VA
1:19-op-45254-DAP	Washington County	VA